

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JACK REESE, FRANCES ELAINE PIDDE,  
JAMES CICHANOFSKY, ROGER MILLER,  
GEORGE NOWLIN and RONALD HITT, on  
behalf of themselves and  
a similarly situated class,

Hon. Patrick J. Duggan

Case No. 04-70592

Plaintiffs,

v.

**Class Action**

CNH GLOBAL N.V., formerly  
known as Case Corporation,  
and CNH AMERICA LLC,

Defendants.

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**EXHIBIT 4**

**TO**

**PLAINTIFFS' SECOND MOTION FOR ATTORNEY FEES**

*UAW v. CHRYSLER LLC*  
07-14310 (E.D. Mich.)(Cleland, J.)  
May 16, 2008

2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

INTERNATIONAL UNION, UNITED  
AUTOMOBILE, AEROSPACE, AND  
AGRICULTURAL IMPLEMENT WORKERS  
OF AMERICA; and WILLIAM ENGLISH,  
GERALD M. SYKES, LARRY J. SCOTT, and  
BEVERLY JENNINGS, on behalf of  
themselves and all other persons similarly  
situated,

Plaintiffs,

v.

CHRYSLER, LLC,

Defendant.

Case No. 2:07-cv-14310-RHC-SDP

District Judge Robert H. Cleland

Magistrate Judge Steven D. Pepe

**FILED**

MAY 16 2008

CLERK'S OFFICE, DETROIT-PSG  
U.S. DISTRICT COURT

**ORDER**

Having considered the motion for an award of attorneys' fees and costs, and notice of that motion having been directed through the Class Notice to the class members in a reasonable manner, the Court makes the following findings of fact and conclusions of law (to be supplemented after counsel supplement their motion 14 days after judgment pursuant to Rule 54(d)(2)):

1. Class Counsel are entitled to fees and nontaxable costs pursuant to ERISA.
2. The hourly rates they seek are reasonable – \$475/hr. for William T. Payne and other senior partners at Stember Feinstein Doyle & Payne, LLC ("SFDP"); \$425/hr. for Stember Feinstein Doyle & Payne ("SFDP"), LLC's junior partners Pamina Ewing and Stephen M.

Pincus; \$390/hr. for SFDP senior associate Jonathan K. Cohn; \$370/hr. for SFDP senior associate Joel R. Hurt; \$400/hr. for SFDP of counsel Lawrence Frolik; \$230/hr. for SFDP first-year attorney Rachael Kassner Davis; and \$125/hr. for SFDP law clerks and paralegals.

3. Given the size and complexity of the case, counsel's estimated award of approximately \$323,255 in attorneys' fees, \$77,500 for expert costs, and \$7,000 in other costs would be reasonable and proper.

4. Further proceedings concerning fees and costs may be held after counsel supplement their motion 14 days after judgment.

So Ordered,



Robert H. Cleland  
United States District Judge

Date: \_\_\_\_\_

cc: All parties of record.